

BATHAE DUNNE LLP

Yavar Bathae (CA 282388)
yavar@bathaedunne.com
Andrew C. Wolinsky (CA 45965)
awolinsky@bathaedunne.com
445 Park Avenue, 9th Floor
New York, NY 10022
Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)
bdunne@bathaedunne.com
Edward M. Grauman (*pro hac vice*)
egrauman@bathaedunne.com
901 South MoPac Expressway
Barton Oaks Plaza I, Suite 300
Austin, TX 78746
Tel.: (213) 462-2772

*Interim Co-Lead Counsel for the
Advertiser Class*

SCOTT+SCOTT ATTORNEYS AT LAW LLP

Amanda F. Lawrence (*pro hac vice*)
alawrence@scott-scott.com
Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
Michael P. Srodoski (*pro hac vice*)
msrodoski@scott-scott.com
156 South Main Street, P.O. Box 192
Colchester, CT 06415
Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)
pcoughlin@scott-scott.com
Carmen A. Medici (CA 248417)
cmedici@scott-scott.com
Hal D. Cunningham (CA 243048)
hcunningham@scott-scott.com
Daniel J. Brockwell (CA 335983)
dbrockwell@scott-scott.com
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel.: (619) 233-4565

[Additional counsel on signature page.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**ADVERTISER PLAINTIFFS'
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER META
PLATFORMS, INC.'S MATERIAL
SHOULD BE SEALED**

1 Pursuant to Civil Local Rule 79-5(f), Advertiser Plaintiffs Affilious, Inc., Jessyca Frederick,
2 Mark Berney, 406 Property Services, PLLC, Mark Young, and Katherine Looper submit this
3 Administrative Motion to Consider Whether Meta Platforms, Inc.’s Material Should Be Sealed. Per
4 the accompanying Declaration of Brian J. Dunne, certain documents and information referenced in
5 the concurrently filed Advertiser Plaintiffs’ Opposition to the Omnibus Motion to Seal Materials
6 Submitted in Connection with Class Certification and *Daubert* Briefing and Merits Expert Proffers
7 in the Advertiser Case (“Opposition”) and the Declaration of Brian J. Dunne in support of the
8 Opposition (“Dunne Opposition Declaration”) have been designated by Defendant Meta Platforms,
9 Inc. as “Confidential” or “Highly Confidential” under the Protective Order. Portions of Advertiser
10 Plaintiffs’ Opposition and the Dunne Opposition Declaration referencing or reflecting information
11 designated as confidential have been redacted from the publicly filed version of the Opposition and
12 the Dunne Opposition Declaration, and unredacted versions of the Opposition and the Dunne
13 Opposition Declaration with the information designated by Meta highlighted in yellow are filed
14 herewith. *See* Civ. L.R. 79-5(e), (f)(1).

15 Advertiser Plaintiffs file these documents under temporary seal solely because they contain
16 information designated Confidential or Highly Confidential under the Protective Order, not because
17 Advertiser Plaintiffs believe they meet the sealing standard (for nearly all of this information,
18 Advertiser Plaintiffs do **not** believe it meets the sealing standard, and may oppose sealing).

19
20 Dated: August 19, 2024
21
22
23
24
25
26
27
28

**SCOTT+SCOTT
ATTORNEYS AT LAW LLP**

Amanda F. Lawrence (*pro hac vice*)
 alawrence@scott-scott.com
 Patrick J. McGahan (*pro hac vice*)
 pmcgahan@scott-scott.com
 Michael P. Srodoski (*pro hac vice*)
 msrodoski@scott-scott.com
 156 South Main Street, P.O. Box 192
 Colchester, CT 06415
 Tel.: (860) 537-5537

Patrick J. Coughlin (CA 111070)
 pcoughlin@scott-scott.com
 Carmen A. Medici (CA 248417)
 cmedici@scott-scott.com
 Hal D. Cunningham (CA 243048)
 hcunningham@scott-scott.com
 Daniel J. Brockwell (CA 335983)
 dbrockwell@scott-scott.com
 600 W. Broadway, Suite 3300
 San Diego, CA 92101
 Tel.: (619) 233-4565

Patrick J. Rodriguez (*pro hac vice*)
 prodriquez@scott-scott.com
 230 Park Avenue, 17th Floor
 New York, NY 10169
 Tel.: (212) 223-6444

Interim Co-Lead Counsel for the Advertiser Classes

LEVIN SEDRAN & BERMAN LLP

Keith J. Verrier (*pro hac vice*)
 kverrier@lfsblaw.com
 Austin B. Cohen (*pro hac vice*)
 acohen@lfsblaw.com
 510 Walnut Street, Suite 500
 Philadelphia, PA 19106-3997
 Tel.: (215) 592-1500

*Members of Executive Committee for the Advertiser
 Classes*

BATHAE DUNNE LLP

By: /s/ Brian J. Dunne
 Yavar Bathae (CA 282388)
 yavar@bathaeedunne.com
 Andrew C. Wolinsky (CA 345965)
 awolinsky@bathaeedunne.com
 Andrew M. Williamson (CA 344695)
 awilliamson@bathaeedunne.com
 Adam Ernette (*pro hac vice*)
 aernette@bathaeedunne.com
 445 Park Avenue, 9th Floor
 New York, NY 10022
 Tel.: (332) 322-8835

Brian J. Dunne (CA 275689)
 bdunne@bathaeedunne.com
 Edward M. Grauman (*pro hac vice*)
 egrauman@bathaeedunne.com
 901 South MoPac Expressway
 Barton Oaks Plaza I, Suite 300
 Austin, TX 78746
 Tel.: (213) 462-2772

Allison Watson (CA 328596)
 awatson@bathaeedunne.com
 3420 Bristol St, Ste 600
 Costa Mesa, CA 92626-7133

AHDOOT & WOLFSON, PC

Tina Wolfson (CA 174806)
 twolfson@ahdootwolfson.com
 Robert Ahdoot (CA 172098)
 rahdoot@ahdootwolfson.com
 Theodore W. Maya (CA 223242)
 tmaya@ahdootwolfson.com
 Henry J. Kelson (*pro hac vice*)
 hkelston@ahdootwolfson.com
 2600 West Olive Avenue, Suite 500
 Burbank, CA 91505
 Tel.: (310) 474-9111